

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

*

VS

*

NO. 03-CR-10385-RGS

*

KIRK RINALDI

*

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SECOND MOTION TO WITHDRAW AS DEFENSE COUNSEL

The undersigned hereby moves to withdraw as defense counsel for the defendant, Kirk Rinaldi, because the defendant has communicated that he believes undersigned counsel has been (a) dilatory in his efforts on defendant's behalf, (b) has failed to pursue assignments he has tasked counsel with, and (c) that there has been a lack of communication and commitment by counsel with the defendant, so that the defendant no longer has faith or trust in counsel's work.

Wherefore, in the interest of justice the court should allow the undersigned's withdrawal as defense counsel in this case and that a substitute counsel be appointed for the defendant.

June 7, 2006

/s/ Karnig Boyajian
Karnig Boyajian (BBO#052080)
Defendant's Attorney
One Gateway Center, Suite 315
Newton, MA 02458
Tel. 617-332-2222
Fax. 617-332-2221

CERTIFICATE

I hereby certify a copy of the within motion was this date delivered, faxed and/or mailed postage prepaid to AUSA Christopher Bator, c/o U.S. Attorney's Office, One Courthouse Way, Suite 9200, Boston, MA, 02110.

June 7, 2006

/s/ Karnig Boyajian
Karnig Boyajian